

Upper Cement Creek, Feedback on Working Revision Documentation Record

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From: Katharine Lima <kncj@sbcglobal.net>

To:

Cc: Myers.Robert@epamail.epa.gov, Leslie Meador <lmeador@mindspring.com>

Good afternoon:

Immediately before our last conference call, the Region provided a "working revision" of the HRS documentation record for Upper Cement Creek, which included three revised source descriptions. CSC has conducted an informal review of this document - overall, the presentation of the material appears to be in good shape. Please note that this was not an intensive QA review, and did not include a check of all the reference citations. CSC has some suggestions, as follows.

- Background: A line was included in the "Hazardous Substances Associated with the Source" section of each source description that appeared to inquire whether a background level should be included for comparison with the source samples. For the waste piles and the adit discharges, no background is required. CSC notes that "reference" levels have previously been provided in some cases where samples of waste were used to associate hazardous substances with the source. For example, the HRS documentation record for a Region 8 mining site that was finalized on the NPL several updates ago (Flat Creek IMM) presented published "typical" levels for metals immediately after the mining waste pile samples. CSC does not necessarily see it as advantageous to use that publication (a USGS professional paper) because some of the published metals levels (in the USGS paper) for surface soils in the area of the Upper Cement Creek site appear to be fairly broad ranges and do not compare favorably with the metals levels in the source waste pile samples.

- Containment: Generally, the written description/justification for the containment value is placed directly into the box with "Release via overland migration and/or flood." This would apply to all sources. For Source 3, it appears that the assigned value may more appropriately be 10. If the adit discharge is perennial, this, along with the sample documenting presence of hazardous substances, represents evidence of migration from the source into surface water.

- Hazardous Waste Quantity: For Sources 1 and 2, the areas provided as part of the Tier C, Volume tables are not the same as the areas provided in the Tier D, Area tables. In addition, CSC was unable to reproduce the volume calculations for these two sources as an anticipated revision to the cited reference has not yet been provided.

Please feel free to contact me if you have any questions concerning this transmittal. Thank you.

-Katharine

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